

EXHIBIT B

Subject: Re: Regarding: Petro Industrial Solutions, LLC v. IPOS, et. al.

Date: Friday, February 10, 2023 at 9:00:19 AM Central Standard Time

From: Alex Kaplan

To: Karima Jenkins-Guzman, Carl Beckstedt, Tarsha Matthew, simone.francis@ogletreedeakins.com,
Gloria Park, asimpson@coralbrief.com

CC: Lee J. Rohn, Info

Attorney Rohn:

Gloria is now on parental leave, as she had a baby earlier this week. Please be sure to direct all future correspondence to Carl and me (and please continue to copy Gloria). Thank you.

We wrote to you on Monday about the deposition schedule, but did not hear back until this morning, the day the parties are due to make a filing. That is not helpful.

There are many inaccuracies in your letter, but we will move past them to try to progress forward. We seem to have agreement on the following:

1. We confirm Adrian Melendez, Jr. and Petro Industrial 30(b)(6) on April 28. (The body of your letter confirms Mr. Melendez Jr., but the chart still says Sr.)
2. You owe us a date, before the June 16 deadline, for Adrian Melendez Sr. Please provide. I suggest you provide us with all dates when you and the witness are available, and I will work with all defense counsel to find a date that works.
3. We will present Charlotte Horowitz and the Vitol Virgin Islands Corp. 30(b)(6) on May 19. If you wind up needing to move that date, we will work with you to find an alternative date, although May 22 will not work given other depositions in this case.
4. We confirm scheduling Chetram Persaud on May 22. We are not seeking the deposition of Rawle Granger, but if you wish to take it, that is of course fine. But it should follow, not precede, the deposition of Chetram Persaud on May 22.
5. We will present Tim Kologinczak on the morning of May 23.
6. We will present Sebastian Moretti on the morning of May 25. (We have discussed with Attorney Francis, who is seeking a scheduling accommodation in her other matter, such that we should plan to proceed with the Moretti deposition on this date, in the morning, so that the deposition is concluded this day.)
7. We can tentatively schedule the Vitol US Holdings Co. 30(b)(6) for June 15, but until we see the 30(b)(6) topics we cannot determine the witness and confirm availability. In any case, we will present the witness on or before the June 16 deadline.
8. As for third-party non-party witnesses, I think the most efficient course is for the parties to issue their respective subpoenas and confer with the third parties or their counsel on their availability. We can then schedule with the benefit of that information.

9. I cannot speak for OPTIS/Canning or IPOS on scheduling the witnesses they represent.
10. Finally, as to your pre-April 28 dates, please provide us with your available dates so that we may try to schedule other depositions on those dates. For any possible date, we can confer with Attorneys Simpson and Francis to see if there schedules have changed or if they are able to get other coverage on those dates.

Thank you.

[Alex Kaplan](#)

Susman Godfrey LLP
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From: Karima Jenkins-Guzman <karima@rohnlaw.com>
Date: Friday, February 10, 2023 at 7:46 AM
To: Carl Beckstedt <carl@beckstedtlaw.com>, Tarsha Matthew <tarsha@beckstedtlaw.com>, "simone.francis@ogletreedeakins.com" <simone.francis@ogletreedeakins.com>, Alex Kaplan <akaplan@SusmanGodfrey.com>, Gloria Park <GPark@susmangodfrey.com>, Andy Simpson <asimpson@coralbrief.com>
Cc: "Lee J. Rohn" <lee@rohnlaw.com>, Info <info@rohnlaw.com>
Subject: Regarding: Petro Industrial Solutions, LLC v. IPOS, et. al.

EXTERNAL Email

Good morning Attorney Park,

Attached, please find correspondence from Attorney Rohn regarding the above-referenced matter.

Best regards,

Karima Jenkins-Guzman

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